

UNITED STATES DISTRICT COURT  
FOR MIDDLE DISTRICT OF PENNSYLVANIA

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5-25-00  
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FILED

HARRISBURG, PA

MAY 24 2000

MARY E. D'AMOREA, CLERK  
Per g/s Deputy Clerk

IN THE MATTER OF

Russell, Neville M.

PETITIONER

NO. 1:CV-00-0536

IN HABEAS CORPUS

28 USC. 2241, PETITION

(PRO-SE)

Kane

PLSLC Schimulph's

MOTION FOR EXTENSION IN SUBMISSION OF BRIEF

Now Comes the Petitioner, Neville Russell, Pro-Se, and respectfully Request For an extension OF Time For Submission OF the Brief, in Support OF his Habeas Corpus Petition. Which is due by May 24, 2000.

This Extension is Necessary in Order to prepare an effective and Meaningful Rebuttal, Since he is proceeding ON PRO-SE basis and avers in Support OF his Claim Hereof:

(1) THE Time Set by the Court For the Submission OF his BRIEF is Too Short to get the job done.

(2) ~~PETITIONER'S~~ ~~RESPONDENT'S~~ Access to the Law Library is Limited to three (3) hours a week, which is NOT

Sufficient Time To Conduct any Meaningful Research To prepare a good argument within this Stipulated Time.

The Service is Aware of the problems pro-Se Litigants are encountering Regarding their Cases, Petitioner believes the Service will not be prejudiced in granting him the extension.

Wherefore, Petitioner prays that the Court grants him the extension he seeks.

Dated: May 21, 2000

Respectfully Submitted,  
Neville M. Russell  
NEVILLE M. RUSSELL.

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

NEVILLE RUSSELL,

PLAINTIFF,

PRO-SE

V.

AFFIRMATION OF SERVICE

IMMIGRATION & NATURALIZATION  
SERVICE(ET-AL)

I Neville Russell Declare under the Penalty of Perjury, that i have  
on the 21<sup>st</sup> day of MAY, 2000 placed and submitted the within  
One (1) copies of the <sup>Attached</sup> following moving papers, to be mailed through the  
institutional mailroom facility at York County Prison, Pennsylvania  
to the following parties:

~~The Clerk of the Court  
U.S. District Court  
Middle District of Pennsylvania  
235 North Washington Avenue  
Scranton, PA. 18501-1148~~

~~U.S. Attorney~~ CLERK OF COURT  
Middle District of Pennsylvania  
228 Walnut Street  
Harrisburg, PA. 17108

SUBMITTED BY,

Neville Russell

NEVILLE RUSSELL, (PRO-SE)

PETITIONER

York County Prison  
York PA. 17402

Executed on the 21<sup>st</sup> day of May, 2000